8/17/2017

VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street SW
Washington DC 20554

Re: Notice of Ex Parte - Wireless Emergency Alerts (WEA) – Docket # 15-91

Dear Ms. Dortch:

On August 17, 2017, Hutch McClendon and John Anderson, both of AC&C, LLC met with James Wiley and Megan Henry and Linda Nagel was on the phone, all of the Public Safety and Homeland Security Bureau, to discuss the Commission's Further Notice of Proposed Rulemaking on Wireless Emergency Alerts.

As AT&T stated in their filling on 12/8/16: "At least two of the proposals in the FNPRM strike AT&T as suitable for a single, well controlled, and managed software application. These are multi-lingual messaging and geo-targeting." We agree. Leveraging the devices location capability improves geo-fencing of WEA alerts and will also improve the personalization of the message, ability to provide alerts in multiple languages, store and update emergency data on the device to minimize access to the wireless network and leverage the intelligence in our devices to further remove demands on the network by programing them to seek additional data from other sources in order to maximize the networks capability for voice and other data communication services critical in an emergency.

Our experience with automatic translators is there are many dialects in each language and you lose the interpretation of the message. While automatic translators are improving we recommend further testing before they are used for WEA. In the meantime, we discussed the following for multi lingual:

- Local alert originators prepare common alerts in their local languages and upon receipt of the alert the device can discriminate and illustrate the version that matches the language used on the phone. If the devices language is not matched with an alert the default display of the alert is English.
- To lower the need for URLs and seeking additional information we discussed social scientists describe actions people should take in recognized imminent

threat emergencies (tornado, hurricane, flash flood, etc.) and store them on the phone. Upon receipt of an alert these action descriptions can be coded to coordinate with an event such as a tornado alert and the user can request to see the additional information stored on the device.

- In addition, we recommend these descriptions be translated into multiple languages and stored on the device. Upon a user wanting more information on an alert the phone will retrieve the description in the language set on the phone. This can lower the burden of the local alert originator to translate and send multiple alerts. Languages will only be limited by the ability of the phone to display them.

We also discussed alerts be geo-fenced to the polygon level using the capabilities of the device. Additional measurements of accuracy will add confusion as they will be difficult to measure and enforce. Once the devices geo-location capabilities are used to contain the alert to those it is relevant we can determine if additional accuracy measurements are necessary.

In regards to network impact caused by leveraging the devices geolocation capability: One way to do this and reduce any burden on the network is to use device-based location only. We referenced RX Networks meeting with the FCC on September 13, 2016 that stated "The participants discussed the fact that most smartphones utilize predictive data for geolocation (referred to as Extended Ephemeris) which is valid for 7-14 days and greatly enhances the time-to- first-fix (TTFF). With predictive data the device is able to determine its location in 5 – 15 seconds, without predictive data it could take 45 – 60 seconds. There are two approaches to positioning – device-based and network-based. Devices can be setup to only use "device-based" geolocation, thereby lessening the potential burden on the carriers' networks. We discussed that fact that there is no need to send location from handset to the network to support device-based WEA. The participants discussed the fact that services like Glympse, Yelp and others use location services located on the device

Additionally, there was a discussion around when a device wakes up (or was in a location that it couldn't get a fix), it would start on the map with lower accuracy (the big blue circle as you would see on a map), but then accuracy improves in seconds (the circle gets smaller) as the "confidence" goes up. This confidence level could be utilized to determine whether to play or don't play the message." Devices know their location plus a confidence level of the location. This information can be used for processing WEA messages and the device can be programmed to play the alert once it has the necessary confidence level that it is located within the alert area. If it is not confident enough

within a specified time period of accessing data from wifi, gps and other non-network sources, it will default to play the message.

Adding device based to WEA and incorporating the intelligence of handsets to discriminate and enhance alerts is the biggest bang for the least cost. AT&T stated in their 12/8/16 filing, “This approach also does not require carriers to undertake expensive modifications to their networks”. By allowing the device to geo-fence the message we give public safety the ability to reach the right people with the right message at the right time. Adding the functionality of device based geo-targeting and providing granular geotargeting capabilities on the same timeline as the other enhancements required by the Report and Order dated 9/29/16, will provide more options to leverage, enhance and reduce risks of adding multi-lingual and clickable URL solutions. The same timeline also creates potential savings for the wireless industry by reducing the cost of developing, testing and deploying these enhancements separately.

There are going to be lessons learned from these new capabilities and with the ease of programming updates for devices, future needs and changes can be adapted much more efficiently.

If you have any questions, please feel free to contact me.

Sincerely,

/s/

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cc: James Wiley
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